

# **Tai Cheung Holdings Limited**

(Incorporated in Bermuda with limited liability)

(Stock Code : 88)

## **External Whistleblowing Policy**

### **1. Objective**

Tai Cheung Holdings Limited (the “Company”, together with its subsidiaries, the “Group”) is committed to maintain a high standard of integrity, openness, probity and accountability. Conforming to this commitment, the Company has established a confidential channel for external parties who deal with the Group to report any concerns about misconduct, malpractice or irregularities within the Group.

### **2. Scope**

**2.1** This Policy applies to the Group and external parties who deal with the Group (e.g. consultants, contractors, suppliers, agents and customers) (“Whistleblowers”).

**2.2** Concerns that may constitute misconduct, malpractice or irregularities may include but is not confined to:

- (a) any existing or possible improprieties in financial reporting, internal controls or other matters;
- (b) non-compliance of the Group’s policies;
- (c) non-compliance of legal or regulatory obligations;
- (d) corruption or criminal activity; and
- (e) endangerment of the health and safety of individuals.

### **3. Policy**

#### **3.1 Reporting channel**

Any Whistleblower who becomes aware of any existing or potential misconduct, malpractice or irregularities within the Group can report to the Company via email (email address: [compliance@taicheung.com](mailto:compliance@taicheung.com)).

## **3.2 Confidentiality**

- 3.2.1 The Group will keep a Whistleblower's identity confidential. However, if the report leads to an investigation by regulators or authorities, it may become necessary for a Whistleblower to provide evidence or be interviewed by the relevant regulators or authorities. The Whistleblower will be advised in advance if his/her identity may become apparent or need to be disclosed.
- 3.2.2 In order not to jeopardize the investigation, the Whistleblower is also required to keep confidential the fact that he/she has filed a report as well as the nature of concerns and the identities of those involved.

## **3.3 Investigations**

- 3.3.1 The Audit Committee of the Company (the "Audit Committee") will assess the report received and decide if a full investigation is necessary. If an investigation is warranted, the Audit Committee will then review the matter and decide how the investigation should proceed. Investigation procedures are set out in Appendix 1.
- 3.3.2 If the Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, the Group reserves the right to take appropriate actions against the Whistleblower to recover any loss or damage as a result of the false report.
- 3.3.3 Whistleblowers are strongly encouraged to provide their names and contact details, so that clarification of the reports made or further appropriate information can be obtained directly from them, where required. However, it is recognized that in some cases Whistleblowers may not feel comfortable identifying themselves. In these cases, anonymous reports may be submitted.

## **3.4 Approval and Review of this Policy**

This Policy has been approved by the board of directors of the Company (the "Board"). The Audit Committee is responsible for monitoring and regular review of this Policy. Any subsequent amendment of this Policy shall be reviewed by the Audit Committee and approved by the Board.

17 March 2022

## Investigation Procedures

